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ATTORNEY FOR PLAINTIFF

**FOR THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BILLINGS DIVISION**

ASTGHIK IKNATIAN,	)	
	)	Cause No. _____
Plaintiff,	)	
vs.	)	
	)	
UNITED STATES OF AMERICA,	)	<b><u>COMPLAINT</u></b>
FEDERAL BUREAU OF	)	
INVESTIGATION,	)	
Defendant.	)	
_____	)	

Plaintiff, Astghik Iknatian, for her complaint against Defendant, United States of America, alleges as follows:

1. Plaintiff, Astghik Iknatian, is an individual of the age of majority and resides in Billings, Yellowstone County, Montana.
2. Defendant is the United States of America, Federal Bureau of Investigation.
3. Plaintiff is initiating this action against Defendant pursuant to 28 U.S.C. 2679(d)(1) and 28 U.S.C. 2679(b)(1).

4. This Court has jurisdiction pursuant to Federal Employees Liability Reform and Tort Compensation Act of 1988, 28 U.S.C. 2679(d)(1).

5. Plaintiff presented her administrative claim to Defendant on or about March 26, 2010. By letter dated May 20, 2010, Defendant acknowledged receipt of the claim on April 1, 2010.

6. Defendant denied Plaintiff's administrative claim by letter dated September 29, 2010. ( or six months have elapsed since the presentation of the administrative claim.)

28 C.F.R. § 14.2(c)

7. On December 31, 2009, Plaintiff was a pedestrian at the intersection of Montana Avenue and North 31<sup>st</sup> Street in Billings, Yellowstone County, Montana, when a vehicle driven by Brett Alan Kruger made a left hand turn at the intersection and struck the Plaintiff.

8. Brett Alan Kruger, was ruled by Judge Cebull to be an employee of the United States of America at the time that he struck Plaintiff on December 31, 2009.

9. Plaintiff incurred injuries and damages as a result of the pedestrian/automobile collision which occurred on December 31, 2009.

10. Brett Alan Kruger negligently and recklessly operated the 2009 Mazda vehicle so as to collide with Plaintiff.

11. As a direct and proximate result of the actions of Defendant, Plaintiff suffered injuries to her body, including, but not limited to, her shoulder and knees which has caused and continues to cause Plaintiff pain and emotional distress.

12. Plaintiff has incurred medical expenses and continues to incur medical expenses as a result of the accident.

13. Plaintiff has lost income due to the injuries she suffered in the accident of December 31, 2009.

14. Defendant is liable for all special and general damages caused by the automobile/pedestrian accident of December 31, 2009.

WHEREFORE, Plaintiff prays that a judgment be entered in favor of the Plaintiff and against the Defendant in an amount to be determined; that Plaintiff be awarded the costs of this action; and for such other and further relief as this Court deems equitable.

**DEMAND FOR JURY TRIAL**

Plaintiff hereby demands a jury trial on all issues so triable.

DATED this 29th day of December, 2010.

PATTEN, PETERMAN, BEKKEDAH & GREEN, PLLC

By\_\_\_\_/s/ W. Scott Green\_\_\_\_\_  
W. Scott Green  
Attorney for Plaintiff